

**AFFIDAVIT OF TASK FORCE OFFICER MICHAEL SULLIVAN  
IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Michael Sullivan, having been first duly sworn, do hereby depose and state as follows:

**INTRODUCTION**

1. I am employed as a Sergeant Detective with the City of Boston (Massachusetts) Police Department. I am also a sworn Special Deputy United States Marshal. I have been employed by the Boston Police Department since October 2005 and am currently assigned as a Task Force Officer to the Federal Bureau of Investigation (“FBI”) Boston Division, Child Exploitation and Human Trafficking Task Force. While employed by the Boston Police Department, I have investigated state and federal criminal violations related to, among other things, the online sexual exploitation of children. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, and 2252A.

3. I submit this affidavit in support of a criminal complaint charging Laurence Pagnoni (“PAGNONI”) (YOB 1960), of Provincetown, Massachusetts, with one count of Distribution of Child Pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A), and one count of Possession of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

4. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this

investigation. I have set forth only the facts that I believe are necessary to establish probable cause to secure a criminal complaint. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

5. The statements contained in this affidavit are based in part on: information provided and written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of subpoenas and other records; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training, and background as a Task Force Officer with the FBI and a Police Officer with the Boston Police Department.

### **PROBABLE CAUSE**

#### **The Person 1 Account**

6. In or around November 2022, the Boston Police Department (“BPD”) arrested an individual (“Person 1”) on various child exploitation charges related to the possession and dissemination of child pornography and extortion of a child. BPD subsequently obtained a search warrant from the Suffolk Superior Court (Doc. Nos. 2384CR00132 & 2384CR00544) for Person 1’s Mega<sup>1</sup> account, which contained approximately 6 links containing at least thousands of files of child pornography. Through the process of subpoenas and search warrants, BPD was able to determine that the subscriber information for the account that generated these links, which appeared as “Laurence Pagnoni” in Person 1’s account, resolved to PAGNONI.<sup>2</sup>

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<sup>1</sup> MEGA (www.mega.nz) is a New Zealand owned company that provides cloud computing services like data storage and file hosting services for their users. The email address provided by the user in creating an account is the primary identifier for the MEGA account. MEGA users can upload digital files to their account in order to store them or make them available to other MEGA account holders by sending links to specific content.

<sup>2</sup> The steps taken to identify PAGNONI as the account user are outlined below. For ease of reference, I will hereinafter refer to this account as “the PAGNONI Mega account.”

7. I have viewed the contents of Person 1's account that were obtained by state search warrant, which included the links referenced above as well as, in some cases, written communications between the two users accompanying specific links. Among other things, I observed chats between Person 1 and the PAGNONI Mega account on May 10, 2022, in which the PAGNONI Mega account sent Person 1 a link containing 257 video files, and on May 16, 2022, in which the PAGNONI Mega account sent Person 1 a link containing 307 video files. I have reviewed a sampling of the videos sent via each link, and I determined the vast majority, if not all of them, to be child pornography. Two are summarized below:<sup>3</sup>

a. May 10, 2022: In a video file that reports to be 1 minute and 59 seconds in duration with the filename of "*1\_4920330356957118588.mp4*" begins with a child about 1-2 years old wearing a diaper laying on a bed with two pillows over his head. The diaper is pulled down by an adult male who starts to touch the boy's penis. The child is then

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<sup>3</sup> I am aware that the "preferred practice" in the First Circuit is that a magistrate judge view images that agents believe constitute child pornography by virtue of their lascivious exhibition of a child's genitals. *United States v. Brunette*, 256 F.3d 14, 17-19 (1st Cir. 2001) (affiant's "legal conclusion parroting the statutory definition [...] absent any descriptive support and without an independent review of the images" insufficient basis for determination of probable cause). Here, however, the descriptions offered "convey to the magistrate more than [my] mere opinion that the images constitute child pornography." *United States v. Burdulis*, 753 F.3d 255, 261 (1st Cir. 2014) (distinguishing *Brunette*). The children described herein are approximately infant to nine years old – in all events, younger than eighteen. Furthermore, the descriptions of the files here are sufficiently specific as to the age and appearance of the alleged children as well as the nature of the sexual conduct pictured in each file, such that the Court need not view the files to find that they depict child pornography. *See United States v. Syphers*, 426 F.3d 461, 467 (1st Cir. 2005) ("The best practice for an applicant seeking a warrant based on images of alleged child pornography is for an applicant to append the images or provide a sufficiently specific description of the images to enable the magistrate judge to determine independently whether they probably depict real children.") (emphasis added); *see also United States v. LaFortune*, 520 F.3d 50, 56 (1st Cir. 2008) (similarly emphasizing *Syphers* court's use of "or" in describing the *Brunette* "best practice"). Where I have included such nonconclusory, sufficiently specific descriptions, this Court need not view the imagery to find that they depict child pornography. Nonetheless, the described imagery is available for review at the Court's request.

positioned on his knees as the adult male inserts his finger into the child's buttocks. The male then places his penis between the child's buttocks. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child's body shape and size, which I believe to be consistent with that of a child.

b. May 16, 2022: In a video with a filename of "*b00 (77\_.mp4*" with a reported duration of 1 minute and 31 seconds displays a child about 5-7 years old with an adult penis inserted into their mouth. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child's body shape and size, which I believe to be consistent with that of a child.

#### **Identification of PAGNONI**

8. In connection with the BPD investigation, beginning in or about March 31, 2023, the Suffolk County District Attorney's Office issued subpoenas for subscriber records for the account that had distributed child pornography to Person 1 (i.e., the PAGNONI Mega account). The records, which I have reviewed, demonstrate the following:

a. The email address associated with the account (which functions as the account username) is loXXXXXXXX18@gmail.com;

b. The account was created on March 21, 2022 by a mobile device at IP address 24.218.66.26;

c. The account was then again created<sup>4</sup> on a new device, this time a computer, on September 14, 2022 at IP address 2601:194:827e:3830:d173:6360:789b:a789; and

d. The name associated with the account is “Laurence PAGNONI.”

9. New Zealand law enforcement also reported to BPD that they learned that the PAGNONI Mega account<sup>5</sup> (*i.e.*, the one associated with email address loXXXXXX18@gmail.com) was associated with another Mega account registered with a Yahoo! email address that contained PAGNONI’s first and last name (hereinafter, the “PAGNONI Yahoo! email”). The account was created on May 13, 2022 by a computer at IP address 24.218.66.26 and then again on a new device, this time a mobile phone, on May 19, 2022 at IP address 2601:194:827e:3830:f184:ac2c:37ad:b38a.

10. I have reviewed records obtained by subpoena for IP addresses associated with certain logins to the PAGNONI Mega account, some of which resolve to Verizon Wireless and some of which resolve to Comcast Communications.<sup>6</sup> The phone number associated with both the Verizon and Comcast accounts was (XXX) XXX-2466. In addition, the subscriber of the Comcast account was PAGNONI, and both the billing and service addresses were listed as his

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<sup>4</sup> Mega uses the term “creation date” to refer to the first time that an account is accessed on a particular device. I have confirmed that this information refers to the same account, not two different accounts. In this instance the inception of the account was on March 21, 2022 when it was created on the mobile device.

<sup>5</sup> According to Mega’s terms and conditions, it has a zero-tolerance policy for Child Sexual Abuse Material/Child Exploitation Material (CSAM/CEM) or Violent Extremism. Account details are voluntarily disclosed to the relevant law enforcement authorities without notifying the user in all cases of alleged CSAM or Violent Extremism.

<sup>6</sup> The subscriber information for the Verizon account was given for May 17, 2022; the subscriber information for the Comcast account was given for September 30, 2022.

residence in Provincetown, Massachusetts<sup>7</sup>.

11. I have also reviewed subscriber records for the PAGNONI Yahoo! email account, which show that Laurence PAGNONI is the subscriber, that his business email address is the recovery address, that the phone number associated with the account is (XXX) XXX-2466. The records also show that IP addresses associated with the PAGNONI Comcast account were used to access the PAGNONI Yahoo! email account 16 times between April 28, 2022 and November 22, 2022, and that a different IP address used to access the PAGNONI Mega account<sup>8</sup> was used to access the PAGNONI Yahoo! email account nine times between May 13, 2022 and December 19, 2022.

12. Investigators also located a Facebook account that bears PAGNONI's name, image, a link to his business's website, and that indicates that he lives in Provincetown. Subscriber records for the account show that the PAGNONI Yahoo! email address and telephone number (XXX) XXX-2466 were associated with the account. IP login records for the account show that the account was accessed on November 8, 2022 by the same IP address that accessed the PAGNONI Mega account on September 14, 2022.

13. I am aware that, as part of an unrelated investigation, members of the Provincetown Police Department acquired PAGNONI's resume, which includes a contact email address for PAGNONI of loXXXXXX18@gmail.com and a contact phone number of XXX-

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<sup>7</sup> The subscriber's name on the Verizon account is listed as a "reseller", "WORKING ASSETS FUNDING", however the phone number is the same number linked to PAGNONI in a number of places, including the one listed on his resume and provided by him to the Provincetown Public Schools and Police Department.

<sup>8</sup> As referenced above, the PAGNONI Mega account has been associated with two email addresses – the PAGNONI Yahoo! email and loXXXXXX18@gmail.com. The records I have reviewed show that this IP address was used to access both Mega accounts – the one associated with loXXXXXX18@gmail.com on March 21, 2022 and the one associated with the PAGNONI Yahoo! email - three times between May 13 and 19, 2022.

XXX-2466. In addition, Provincetown Police Department provided investigators with an email sent from loXXXXXX18@gmail.com on May 21, 2022. The email provides a display name of “Laurence Pagnoni” and is signed by the sender of the email with, “*Laurence, Unit X, XXX XXXXXX St. Provincetown, MA XXX.XXX.2466, texts are fine.*”

14. Based on all of the foregoing, I submit that PAGNONI was the user of the Mega account that distributed child pornography to Person 1. Specifically, the Mega account is linked with his email address loXXXXXX18@gmail.com, which is connected to PAGNONI through numerous means, including but not limited to, his cellphone number, the presence of the email account on his actual cellphone, PAGNONI listing the email account on his resume, and using it to email to the Provincetown Schools. In addition, the same IP address used to access the Mega account in May of 2022 resolves back to a Comcast account in his name and listing his residence as the service address. This Comcast IP address is also linked to his Yahoo email and his Facebook account. Finally, evidence of his use of the Mega account was discovered on his cellphone, specifically the accounts password was saved in his phone.

### **The PAGNONI Warrants**

15. Based in part on the above information I sought and received two federal search warrants (23-6130-MPK and 23-6131-MPK) related to PAGNONI; one for his residence in Provincetown, MA and one for his person. The FBI executed the warrants on May 18, 2023. PAGNONI was present at the residence on that date.

16. The search resulted in the seizure of several digital devices, including an Apple iPhone 11, which was located on a counter in the kitchen area of the residence. The Apple iPhone 11 was seized and later searched. In reviewing the data recovered from the Apple iPhone 11, I observed several thousand files that I believe are child pornography. I submitted those files

to the National Center for Missing and Exploited Children (“NCMEC”), which identified 51 known series<sup>9</sup> of child pornography from the submitted files.

17. A sampling of the files I believe to be child pornography are described below:

a. A video file, with the filename of *2018-12-22 06.17.19\_1*, displays a prepubescent male who appears to be about 5 to 7 years old, with an adult penis inserted into his anus. The child’s penis and anus are exposed and are the focal point of the video. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child’s body shape and size, which I believe to be consistent with that of a child.

b. A video file, with the filename of *2018-09-22 10.51. 1.23*, that displays a prepubescent female who appears to be about 7 to 9 years old engaged in vaginal sexual intercourse with an adult male. The male appears to ejaculate on the child’s face. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child’s body shape and size, which I believe to be consistent with that of a child.

c. A video file, with the filename of *-6yo enjoy dads cock on Vimeo*, displays a prepubescent male who appears to be about 6 to 8 years old, with an adult penis inserted into his mouth. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child’s body shape and size, which I believe to be consistent with that of a child.

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<sup>9</sup> When files submitted to NCMEC contain imagery of child victims of sexual abuse who have been identified by law enforcement, the series of files are grouped and referred to by a particular name, which may be an actual child’s name, pseudonym, or a commonality between the images/videos in the series, like a piece of furniture or article of clothing.



18. I observed that a Mega account had been accessed on the Apple iPhone, with the PAGNONI Yahoo! email address as the username. I also observed artifacts for that email account, PAGNONI's business email address, and loXXXXXX18@gmail.com on the Apple iPhone 11, which indicates that the user of the phone at some point accessed all three email accounts.

19. Based on the above information I obtained a federal warrant (24-6048-MPK) to view files in the Mega account (and connected accounts) that had distributed child pornography to Person 1, which, as outlined above, I believe belongs to PAGNONI. In reviewing those files, I observed files that I believe constitute child pornography. A sampling of the files I believe to be child pornography are described below:

a. A file with the filename of *00.wmv* is a two minute and 53-second video that displays a prepubescent female, about 5 to 7 years old, sitting naked on a floor as she inserts a sharpie marker into her vagina. The child's legs are spread open. The video transitions display an adult penis that is self-masturbating and then ejaculating on to the child's vagina. The same child is then observed masturbating an adult penis. The child is observed with the penis inserted into the child's mouth. The child opens her mouth and spits out a white fluid on the male. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child's body shape and size, which I believe to be consistent with that of a child.

b. A file with the filename of *B08.mpg* is a 28 minute and five second video that displays an adult male with his penis inserted into the anus of a 7 to 9-year-old prepubescent boy. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child's body

shape and size, which I believe to be consistent with that of a child.

c. A file with the filename of *B11.mpg* is a 10 minute and 40 second video that displays a 7 to 9-year-old boy with a penis in his mouth. The video transitions to display a 7 to 9-year-old boy with an adult penis inserted into his mouth. My opinion of the age of the child described above is based on the size and appearance of the child as compared to the adult male depicted; and the child's body shape and size, which I believe to be consistent with that of a child.

### CONCLUSION

20. Based on all of the foregoing, I submit that there is probable cause to believe the following:

a. On or about May 10 and 16, 2022, Laurence PAGNONI knowingly distributed and attempted to distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and

b. On or about May 18, 2023, Laurence PAGNONI knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and

affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Sworn to under the pains and penalties of perjury,

/s/ Michael Sullivan

Task Force Officer Michael Sullivan  
Federal Bureau of Investigation

SWORN before me telephonically pursuant to Fed. R. Crim. P. 4.1 this <sup>16</sup> day of April 2024.



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HONORABLE M. PAGE KELLEY  
UNITED STATES MAGISTRATE JUDGE